

To: Naranjo, Eugenia[Naranjo.Eugenia@epa.gov]
Cc: Carlie Thompson[cthompson@tierrasolutionsinc.com]; Glenn Springs, Holdings, Inc. (juan_somoano@oxy.com)[juan_somoano@oxy.com]; Enrique Castro[ecastro@tierrasolutionsinc.com]; Iannuzzi, Tim[Tim.Iannuzzi@arcadis.com]
From: Clifford Firstenberg
Sent: Wed 11/2/2016 5:15:16 PM
Subject: Re: Proposed Date for Exposure Factors/Toxicity Reference Value Memorandum deliverable to USEPA
[removed.txt](#)

No. We are looking for an extension of delivery of the EP (or EV)/TRV memo to the end of November.

Clifford Firstenberg
Sent from my iPhone

On Nov 2, 2016, at 1:08 PM, Naranjo, Eugenia <Naranjo.Eugenia@epa.gov> wrote:

Cliff,

Are you looking for an extension from November 10 to November 14? If that's the case, then it's OK.

Eugenia

From: Clifford Firstenberg [<mailto:cfirstenberg@tierrasolutionsinc.com>]
Sent: Wednesday, November 02, 2016 6:51 AM
To: Naranjo, Eugenia <Naranjo.Eugenia@epa.gov>
Cc: Carlie Thompson <cthompson@tierrasolutionsinc.com>; Glenn Springs, Holdings, Inc. (juan_somoano@oxy.com) <juan_somoano@oxy.com>; Enrique Castro <ecastro@tierrasolutionsinc.com>; Iannuzzi, Tim <Tim.Iannuzzi@arcadis.com>
Subject: FW: Proposed Date for Exposure Factors/Toxicity Reference Value Memorandum deliverable to USEPA

Eugenia

Tierra would like to request an extension for delivery of the EF/TRV memorandum for the reasons outlined in Tim's email, below. In short, we need additional time to review the

revised BERA for the LPRRP (and supporting documents) that we received only two weeks ago, and with which we are striving to be consistent. Importantly, this will not impact the due-date of the BERA to USEPA, barring any other unforeseen issues, and thus, will not affect the project schedule.

If you would like to discuss, please let me know, but, as you also know, I am out in the field Wed and Thu this week, so we will have to schedule accordingly. As of now, I am planning to be at Lister on Thursday when you visit, so we should be able to chat at that time, if necessary.

Thanks

Cliff

-

Clifford E. Firstenberg
Principal and Environmental Sciences Manager
Tierra Solutions, Inc.

E-mail: cfirstenberg@tierrasolutionsinc.com

Phone: ***New number: 757-282-6462*** (757-258-7720 no longer in service)

Cell: 757-206-6281

<image001.jpg>

CONFIDENTIALITY NOTICE...

The information in this email may be confidential and/or privileged. This email is intended to be reviewed by only the individual or organization named above. If you are not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this email and its attachments, if any, or the information contained herein is prohibited. If you have received this email in error, please immediately notify the sender by return email and delete this email from your system.

Thank You.

From: Iannuzzi, Tim [<mailto:Tim.Iannuzzi@arcadis.com>]
Sent: Tuesday, November 01, 2016 12:44 PM
To: Carlie Thompson <cthompson@tierrasolutionsinc.com>; Clifford Firstenberg <cfirstenberg@tierrasolutionsinc.com>
Cc: Iannuzzi, Tim <Tim.Iannuzzi@arcadis.com>
Subject: Proposed Date for Exposure Factors/Toxicity Reference Value Memorandum deliverable to USEPA

Carlie and Cliff,

Per my conversation with Cliff this morning, we are making very good progress on our BERA-related deliverables, but we need to ask for an extension on the EF/TRV memo.

This memo was triggered after the approval of the Phase III QAPP which currently puts it at November 14th as the due date I believe.

The reason we need a bit more time is as follows:

On October 4th, USEPA provided Tierra (at our request) documentation on the comments, directives and RTCs relative to the CPG BERA process for the LPRRP. Then on October 17th, we received a link to a revised BERA. It was our intention to utilize, to the extent possible and technically appropriate, the exposure factors and toxicity reference values

compiled, evaluated and vetted by CPG and the USEPA for the estuarine portion of LPR in evaluating/selecting our preliminary values for the NBSA BERA. This is consistent with the mandate by USEPA to keep the process for the two sites consistent. Now that we have had some time to initially review the revised CPG BERA, we realize that it is very different than the draft version we previously had, and contains a variety of TRVs that CPG was directed to use by USEPA. Many of these seem to link to the risk work conducted by Battelle for the lower 8 mile FFS, and this requires us to go back and evaluate those documents for context. Given all of the documents we received in the last couple of weeks, and the complexity of the datasets and literature used to derive multiple sets of TRVs, we need to request more time to complete our memorandum. I am proposing a new due date to USEPA by the end of November. This short delay will not impact the schedule for starting the BERA process in February, as the present date to have final agreement on the EF/TRV memorandum was January 31st, a month prior to the start of the BERA report.

Let me know if we need to discuss further.

Thanks,

Tim

Timothy Iannuzzi | Senior Vice President/Principal Scientist | tim.iannuzzi@arcadis.com

Arcadis | North America

361 Broadview Lane Annapolis MD | 21401 | USA

T. +1 443 699 6369

Connect with us! www.arcadis.com | [LinkedIn](#) | [Twitter](#) | [Facebook](#)

<image002.png>

Be green, leave it on the screen.

<image003.png>

This e-mail and any files transmitted with it are the property of Arcadis. All rights, including without limitation copyright, are reserved. This e-mail contains information which may be confidential and may also be privileged. It is for the exclusive use of the intended recipient(s). If you are not the intended recipient(s) please note that any form of distribution, copying or use of this communication or the information in it is strictly prohibited and may be unlawful. If you have received this communication in error please return it to the sender and then delete the e-mail and destroy any copies of it. Whilst reasonable precautions have been taken to ensure no software viruses are present in our emails we cannot guarantee that this e-mail or any attachment is virus-free or has not been intercepted or changed. Any opinions or other information in this e-mail that do not relate to the official business of Arcadis are neither given nor endorsed by it.